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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

10  
11 ALEX VILLANUEVA,  
12 Plaintiff,  
13 v.  
14 COUNTY OF LOS ANGELES,  
15 COUNTY OF LOS ANGELES  
16 SHERIFF'S DEPARTMENT, LOS  
17 ANGELES COUNTY BOARD OF  
18 SUPERVISORS, COUNTY EQUITY  
19 OVERSIGHT PANEL, LOS  
20 ANGELES COUNTY OFFICE OF  
21 INSPECTOR GENERAL,  
22 CONSTANCE KOMOROSKI,  
23 MERCEDES CRUZ, ROBERTA  
YANG, LAURA LECRIVAIN,  
SERGIO V. ESCOBEDO, RON  
KOPPERUD, ROBERT G. LUNA,  
MAX-GUSTAF HUNTSMAN,  
ESTHER LIM, and DOES 1 to 100,  
inclusive,  
Defendants.  
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**CASE NO. 2:24-cv-04979-SVW (JC)**

**DEFENDANTS' NOTICE OF  
MOTION TO DISMISS PLAINTIFF  
ALEX VILLANUEVA'S FIRST  
AMENDED COMPLAINT FOR  
DAMAGES AND INJUNCTIVE  
RELIEF**

*[Filed Concurrently with Memorandum  
of Points and Authorities; Declaration  
of Jason H. Tokoro; and [Proposed]  
Order]*

Date: November 18, 2024  
Time: 1:30 p.m.  
Crtrm.: 10A – First Street Courthouse

Assigned to the Hon. Stephen V.  
Wilson and Magistrate Judge Jacqueline  
Chooljian

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on November 18, 2024, at 1:30 p.m., or as  
3 soon thereafter as the matter may be heard before the Honorable Stephen V. Wilson,  
4 United States District Court Judge, in Courtroom 10A of the First Street Courthouse,  
5 located at 350 West First Street, Los Angeles, California 90012, Defendants County  
6 of Los Angeles, County of Los Angeles Sheriff's Department, Los Angeles County  
7 Board of Supervisors, County Equity Oversight Panel, Los Angeles County Office  
8 of Inspector General, Constance Komoroski, Mercedes Cruz, Roberta Yang, Laura  
9 Lecrivain, Sergio V. Escobedo, Ron Kopperud, Robert G. Luna, Max Huntsman and  
10 Esther Lim (collectively, "Defendants"), will, and hereby do, move for an order  
11 dismissing the complaint filed by Plaintiff Alex Villanueva ("Plaintiff"), pursuant to  
12 Rule 12(b)(6) on the ground that the First Amended Complaint for Damages and  
13 Declaratory Relief fails to state a claim upon which relief can be granted.

14 **LOCAL RULE 7-3 STATEMENT**

15 This motion is made following a telephonic conference of counsel pursuant to  
16 Local Rule 7-3, which took place on October 7, 2024, at 4:00 p.m. Prior to that  
17 conference, on October 4, 2024, Defendants sent Plaintiff a written meet-and-confer  
18 letter outlining Defendants' positions. A copy of that letter is attached as Exhibit 1  
19 to the Declaration of Jason H. Tokoro. Defendants never received any written  
20 response from Plaintiff.

21 \* \* \*

22 This Motion is based on this Notice of Motion, the attached Memorandum of  
23 Points and Authorities, the Declarations of Jason H. Tokoro and exhibits thereto, the  
24 pleadings and papers on file in this action and any oral argument that may be  
25 presented when the Motion is heard.

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1 DATED: October 15, 2024

Respectfully Submitted,

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5 MILLER BARONDESS, LLP

6 By: /s/ Jason H. Tokoro

7 JASON H. TOKORO

8 Attorneys for Defendants

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